

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

KIMIESHA HILL, et al., on behalf of themselves))	
and all others similarly situated,)	
)	Case No. 5:21-cv-00097-SLP
Plaintiffs,)	
)	
v.)	
)	
TOWN OF VALLEY BROOK, et al.,)	
)	
Defendants.)	
)	

UNOPPOSED MOTION TO EXTEND CASE DEADLINES

Plaintiffs Kimiesha Hill, Jason Garnett, and Kiara McCorkle, by and through their undersigned counsel, hereby move this Court to extend all deadlines set forth in the Court's Order, ECF No. 122, by 120 days. This is Plaintiffs' fourth request to extend case deadlines, which they file as they wait for Defendants to sign a settlement agreement that Defendants communicated their approval of on November 6, 2023. In support of this request, Plaintiffs aver as follows:

1. Pursuant to this Court's Order at ECF No. 122, the current case deadlines are as follows:

Event	Deadline
Class certification motion, including all supporting exhibits and reports to be filed by	January 26, 2024
Opposition to class certification motion, including all supporting exhibits and reports to be filed by	March 13, 2024

Reply in support of class certification filed by	Pursuant to Local Civil Rules of this Court
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2. On September 22, 2023, the parties filed a Joint Motion to Stay All Case Deadlines for 120 days. ECF No. 121. In support of their Motion, the parties explained that they had reached a tentative settlement agreement that they were in the process of finalizing. *Id.* ¶ 10-12.
3. This Court granted the parties' Motion on September 25, 2023, and, among other actions, extended the case deadlines for 120 days. ECF No. 122.
4. Since that time, the parties negotiated a final settlement agreement. Defendants approved the terms of the settlement agreement on November 6, 2023.
5. By November 20, 2023, the parties had finalized a written settlement agreement. On December 5, 2023, Defendants confirmed they were collecting signatures to the written settlement agreement.
6. Since that time, Plaintiffs have been waiting for Defendants to provide signatures to the settlement agreement.
7. Plaintiffs requested updates on the status of the signatures on December 12, 2023; December 19, 2023; January 2, 2024; January 12, 2024; and January 19, 2024. Most recently, Defendants represented on January 22, 2024 that they would be able to finalize the settlement agreement "shortly".
8. Plaintiffs negotiated the settlement agreement in good faith, and because the parties are in the final stage of settlement, only awaiting signatures, Plaintiffs

have informally stayed discovery and further efforts to pursue litigation, including preparing a motion for class certification.

9. Plaintiffs emailed Defendants on January 22, 2024, notifying them that Plaintiffs intend to file this Motion to extend case deadlines, and that if the parties are unable to finalize the settlement agreement by Friday, February 9, 2024, Plaintiffs will resume their fact and class discovery efforts.
10. In light of Defendants continued settlement delays, Plaintiffs seek to amend the Order.
11. An extension will not affect any other deadlines in this case beyond class certification.
12. Plaintiffs have notified Defendants of this Motion to Extend Case Deadlines and been advised that Defendants do not oppose this Motion.
13. As a result, Plaintiffs now respectfully request an extension until 120 days, as follows:

Event	Proposed Deadline
Class certification motion, including all supporting exhibits and reports to be filed by	May 27, 2024
Opposition to class certification motion, including all supporting exhibits and reports to be filed by	July 11, 2024
Reply in support of class certification filed by	Pursuant to Local Civil Rules of this Court

14. A proposed order is being sent to the Court's inbox for proposed orders.

Respectfully submitted January 23, 2024.

/s/ Jonathan M. Irwin

Jason A. Leckerman
Lisa Swaminathan
Ballard Spahr LLP
1735 Market St. 51st Floor,
Philadelphia, PA 19103
215.864.8266 DIRECT
215.864.8999 FAX
LeckermanJ@ballardspahr.com
SwaminathanL@ballardspahr.com
Admitted pro hac vice

Arthur Ago
Tianna Mays
Lawyers' Committee for Civil Rights
Under Law
1500 K Street NW, Suite 900
Washington, DC 20005
202-662-8600 DIRECT
202-783-0857 FAX
aago@lawyerscommittee.org
tmays@lawyerscommittee.org
Admitted pro hac vice

Woodrow K. Glass (OBA #15690)
Jonathan M. Irwin (OBA # 32636)
Ward & Glass
1601 36th Ave NW
Norman, OK 73072
405.253.4031 DIRECT
405.360.7902 FAX
woody@wardglasslaw.com
Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on January 23, 2024, I electronically submitted the attached document to the Clerk of Court using the ECF System. Based on the records currently on file, the Clerk of the Court will transmit a Notice of Electronic Filing to the ECF registrants on file.

s/Jonathan Irwin
Jonathan M. Irwin